ATTACHMENT A

DEFINITIONS

1. Philip Morris Incorporated (Philip Morris) includes all of its affiliates, present and former subsidiaries, divisions, branches, predecessors or successors in interest, and all present and former officers, directors, partners, employees, agents and representatives, and each person purporting to act on behalf of any of the foregoing.

2. "Document" refers to each and every writing, of whatever nature, whether an original, a draft, or a copy, however produced, reproduced, or stored, whether manually, mechanically, electronically, electromagnetically or otherwise, and each and every tangible thing from which information can be processed or transcribed.

   a. "Document" includes all drafts and versions, whether or not identical with the final document, and also includes all copies which are not identical with the original, whether or not different because of notes made on or attached to such copy or otherwise. The term "document" includes, but is not limited to, letters, telegrams, telexes, facsimiles, contracts, agreements, memoranda, receipts, calendars, diaries, appointment books, personal files, telephone messages and message logs, notes, schedules, work sheets, books, pamphlets, summaries, proposals, photographs, ledgers, statements, files, invoices, billing information, notebooks, checks, records of wire transfers or cash payments, charts, graphs, research materials, prospectuses, registration statements, and computer printouts and other computer-generated writings, or any similar item.

   b. The terms "documents" and "records" do not include items available in the public domain and authored by persons or entities which are not related to Philip Morris, its officers, employees, agents or representatives. However, documents or records from other tobacco companies, the Council for Tobacco Research, the Tobacco Institute or officers, employees, agents or representatives thereof should be produced.

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3. "Record" includes all tangible, written or non-written forms of expression in your possession, custody or control, including partial, preliminary and completed versions, however created, produced or stored, whether electronically, electromagnetically or otherwise, including, but not limited to, tape recordings, video recordings, magnetic tapes, disks, diskettes, disk packs, and other electronic media, microfilm, microfiche, and storage devices, or any similar item.

4. The term "relating to" means referring to, discussing, describing, mentioning, noting, studying, reflecting, evaluating, analyzing or being in any way relevant.

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DOCUMENTS AND RECORDS TO BE PRODUCED

1. Any and all documents or records relating to any policy, rule, custom, practice or procedure for written or oral communications with any research facility or affiliate located outside of the United States (e.g. the attached communication referred to as Philip Morris document #2000512794).

2. For each year from 1960 to the present, any and all documents or records relating to any document or record storage, shipment, distribution, routing or classification, policy, rule, custom, practice or procedure.

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